

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Pierre R. Paul	:	Chapter 13
Debtors	:	Case No.: 20-14528-MDC

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Pierre R. Paul (the “Debtor”), by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on or about November 23, 2020 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about March 16, 2021.
3. On February 26, 2024, MidFirst Bank (the “Mortgagee”) approved the Debtor for a partial claim in the amount of \$23,079.76 (the “Partial Claim”). See Exhibit “A.”
4. The Partial Claim addresses any and all pre-petition and post-petition arrears incurred by the Debtor with respect to the Mortgagee’s claim.
5. On February 28<sup>th</sup>, the Mortgagee filed a Motion for Relief with respect to the Real Property located at 7517 Mayland Street, Philadelphia, PA 19138
6. Accordingly, the Debtor is filing the instant Motion to Modify their Chapter 13 plan to cure the post-petition mortgage arrears.
7. The Debtor is concurrently filing this motion to approve the Partial Claim.
8. The Debtor has paid \$7,545.00 to the Chapter 13 Trustee to date.

9. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$286.00 per month for 21 months for a new base amount of \$13,551.00. See Exhibit "B."

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: March 15, 2024

/s/Brad J. Sadek, Esq.

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